

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION

|                          |   |               |
|--------------------------|---|---------------|
| UNITED STATES OF AMERICA | § |               |
|                          | § |               |
| v.                       | § | 4:12-MJ-116-Y |
|                          | § |               |
| MARCO A. FLORES (1)      | § |               |

**JOINT MOTION TO EXTEND TIME TO INDICT**

The Defendant, MARCO A. FLORES (1), by his counsel, Christopher A. Curtis, Assistant Federal Public Defender, and the government hereby file this Joint Motion to extend the Time to Indict, and show the Court the following:

1. The defendant was taken into Federal Custody on March 29, 2012, and a federal criminal complaint was filed that same day in the above-styled case, charging the offense of possession of child pornography in violation of 18 U.S.C. § 2252(a)(4)(B).
2. Under the Speedy Trial Act, 18 U.S.C. § 3161(b), an indictment must be returned on the instant charge “within 30 days from the date on which such [defendant] was arrested or served with a summons in connection with such charges.”
3. The parties request an extension of this date until May 30, 2012. This could be an extension of 30 days for the time limit to return an indictment.
4. The reason for this requested extension is that the defense is in the process of reviewing the discovery by the government, and the parties are in the process of plea

negotiations. The granting of this requested extension would assist in the disposition of this case without a jury trial. The parties believe that such an extension would serve the ends of justice and would outweigh the public's interest in a speedy trial. See 18 U.S.C. § 3161(h)(8)(A). The parties submit that this request is not made for the purpose to unduly delay the proceedings, but rather to assure that justice is achieved.

WHEREFORE, the defendant respectfully requests that the court continue the deadline to return an indictment in this matter for at least 30 days.

Respectfully submitted,

RICHARD A. ANDERSON  
Federal Public Defender

BY: 

CHRISTOPHER A. CURTIS

TX Bar No. 05270900  
Asst. Federal Public Defender  
819 Taylor Street, Room 9A10  
Fort Worth, TX 76102-6114  
817/978-2753  
Attorney for Defendant  
Marco A. Flores

SARAH SALDANA  
United States Attorney

By: 

AISHA SALEEM

TX Bar. No. 00786218  
Assistant U.S. Attorney  
801 Cherry Street, Suite 1700  
Fort Worth, Tx. 76102  
817/252-5200

**CERTIFICATE OF CONFERENCE**

I, hereby certify that I, Christopher A. Curtis, attorney for defendant, did confer with Aisha Saleem the Assistant United States Attorney assigned to this matter, and she does not oppose, and in fact joins, the defendant's request to continue the deadline for the return of indictment.

  
\_\_\_\_\_  
CHRISTOPHER A. CURTIS


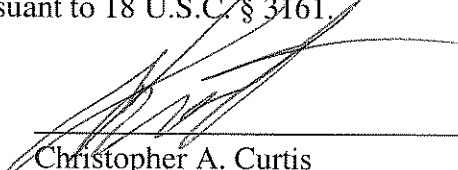
**CERTIFICATE OF SERVICE**

I, Christopher A. Curtis, hereby certify that on April <sup>18th</sup>, 2012, a copy of the forgoing motion was hand delivered to Aisha Saleem at the office for the United States Attorney, 801 Cherry Street, Suite 1700, Fort Worth, Texas 76102.

  
\_\_\_\_\_  
CHRISTOPHER A. CURTIS

**CONCURRENCE OF DEFENDANT**

I, Marco A. Flores, defendant, having been informed of my right to be indicted within 30 days of my arrest, and the filing of the criminal complaint, and having consulted with my attorney, hereby knowingly and voluntarily waive my right to be indicted within 30 days of my arrest and the filing of the criminal complaint, and join in this motion and request the court grant the extension of the 30 day time limit for the return of the indictment, pursuant to 18 U.S.C. § 3161.

  
\_\_\_\_\_  
Marco A. Flores  
Defendant  
\_\_\_\_\_  
Christopher A. Curtis  
Attorney for Defendant

Signed this 18 day of April, 2012